UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JULIENNE MULLETTE   :   CHAPTER 13
        Debtor   :
                                        :

JACK N. ZAHAROPOULOS   :
STANDING CHAPTER 13 TRUSTEE   :
        Movant   :
                                        :
        vs.   :
                                        :

JULIENNE MULLETTE   :
        Respondent   :   CASE NO.   5-24-bk-00023

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

      AND NOW, this   31st   day of July , 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

      1.   Debtor(s)' plan violates 11 U.S.C. § 1325(a)(4) in that the value of property to be distributed under the plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7.   More specifically, the debtor has excess non-exempt equity in the following:

          a.   Provide copy of Listing Agreement for sale of
             298 Maple Grove Road.

      2.   The Trustee avers that debtor(s)' plan is not feasible based upon the following:

          a.   The plan is underfunded relative to claims to be paid.   Plan
             will be underfunded if the real estate is surrendered.

      WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

          a.   Deny confirmation of debtor(s) plan.

b. Dismiss or convert debtor(s) case.
c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Agatha R. McHale
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 31st day of July, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

John Martin, Esquire
1022 Court Street
Honesdale, PA 18431

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee